

All in violation of Title 33, United States Code, Sections 1311(a) and 1319(c)(1).

<u>Count Number</u>	<u>Date (on or about)</u>
1	May 22, 1986
2	May 30, 1986
3	June 4, 1986
4	June 11, 1986
5	June 13, 1986
6	June 19, 1986
7	June 22, 1986
8	June 23, 1986
9	June 26, 1986
10	August 20, 1986
11	August 25, 1986
12	August 27, 1986
13	September 3, 1986

Counts 14 - 22

On or about each of the dates enumerated and set forth in separate counts below, which counts incorporate this paragraph by reference, at Seattle, within the Western District of Washington, RIEDEL INTERNATIONAL, INC., JAMES A. REPMAN and RONALD E. SUMMERS, did willfully and negligently discharge or cause to be discharged pollutants, that is wastewater generated from concrete manufacture and distribution, from a point source into a navigable water of the United States, Lake Union, without a permit for said discharge

under the National Pollutant Discharge Elimination System, pursuant to Title 33, United States Code, Sections 1311(a) and 1342.

All in violation of Title 33, United States Code, Sections 1311(a) and 1319(c)(1).

<u>Count Number</u>	<u>Dates (on or about)</u>
14	April 4, 1986
15	April 21, 1986
16	September 11, 1986
17	September 12, 1986
18	September 15, 1986
19	September 16, 1986
20	September 18, 1986
21	September 19, 1986
22	October 9, 1986

A TRUE BILL

DATED: _____

GENE S. ANDERSON
United States Attorney

FOREPERSON

JACKSON L. FOX
Assistant United States Attorney

HELEN J. BRUNNER
Special Attorney
Environmental Crimes Section
Department of Justice

